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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et
al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698

**DECLARATION OF DWIGHT DIVELY
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY RELIEF**

DECLARATION OF DWIGHT DIVELY

I, DWIGHT DIVELY, declare:

1. I am over the age of 18 years, am competent to testify as to the matters in this Declaration, and make it based on personal knowledge in addition to my review of relevant business records.

2. I am the Chief Operating Officer (“COO”) and Director of Performance, Strategy and Budget (“PSB”) for the Martin Luther King, Jr. County (“King County”). I have been in this position since 2010. I am also a member of Executive Shannon Braddock’s Senior Leadership Team. I am also an affiliate assistant professor at the University of Washington, Evans School of Public Policy and Governance. Before joining King County, I was the City of Seattle’s Director of Finance for 15 years.

3. As King County's COO, I am charged with overseeing and understanding King County operations and its various books of business. I am responsible for developing and monitoring the biennial King County budget, implementing the King County Strategic Plan, identifying and tracking performance measures, developing and implementing the King County Comprehensive Plan, overseeing business planning, and managing many of the grants received by King County. I oversee a wide range of activities, including project analysis, financial forecasting, program evaluation, demographic analysis, and policy development. I also track the budgets of individual King County departments and the public services they provide.

King County

4. Located in the Pacific Northwest, at 2,307 square miles, King County has almost twice the land area of the State of Rhode Island. With a population of approximately 2.3 million people, King County is the 12th most populous county in the United States. King County contains over 800,000 acres of forests, more than 60 named lakes, over 3,000 miles of rivers and streams, and is bounded by Puget Sound to the west. While the eastern portion of King County is dominated by the Cascade Mountain Range, King County's 39 cities, the largest of which is the City of Seattle, are primarily located in western lowlands. King County owns over 200 parks, 175 miles of regional trains, and 215 miles of backcountry trails. It is home to some of Washington's most well-known businesses,

1 including Microsoft, Amazon, Starbucks, Costco and Boeing Commercial Aircraft, alongside many
 2 higher education institutions such as the University of Washington.

3 5. King County government provides a full range of local and regional, urban and rural
 4 services across the County's diverse geography, managing nearly 17,700 employees and an overall
 5 approximately \$10.2 billion budget. Among other things, King County operates a regional wastewater
 6 service, one of the largest bus transit systems in the county, a water-based transit service, and an
 7 international airport. The King County sheriff provides direct law enforcement services for
 8 unincorporated King County and 12 contract cities, as well as county-wide services mandated by state
 9 law. King County supports all felony prosecution and adjudication of state crimes committed within
 10 the County's boundaries through provision of the King County Prosecuting Attorney's Office, the
 11 Department of Public Defense, and both Superior and District Court services. It runs extensive public
 12 health, social health, and mental health services and supports other social service infrastructure for
 13 homeless, migrant, and refugee populations. King County is also responsible for overseeing King
 14 County voting in local, state and federal elections and funding emergency management services.

15 6. As a public entity, King County is not a profit-making enterprise, and the costs of
 16 providing these public services always exceed King County's non-tax-related revenues. King County
 17 secures additional state and federal funding support through several types of arrangements. King
 18 County's 2025 general fund and enterprise operating budgets include more than \$200 million in
 19 federal revenue. Some federal funding is received indirectly through the State of Washington.

20 7. King County also enhances its efficiency, expertise, and capacity by working closely
 21 with various federal agencies in performing mission critical work and in turn helping the federal
 22 government meet its legal and constitutional objectives under our federalist system.

23 8. King County's capital budget is supported by federal revenue forecasted for several
 24 years into the future. The amount of federal capital funds either awarded to King County for 2025 or
 25 included in the budget for 2025 based on congressionally required formula funding is approximately
 26 \$500 million. Capital projects require dependable funding sources over the lengthy timelines required
 27 for design through full project build-out and always require King County to make extensive and
 28 expensive third-party contract commitments.

1 9. An important consideration for both operating and capital expenditures funded by the
2 federal government is the timeliness of federal disbursements. King County fulfills its mission critical
3 functions both through the efforts of its employees and through the services of third-party contractors.
4 King County does not have the ability – particularly in a time of general fund shortfalls and revenue
5 challenges – to float federal debts or untimely payments that are owed to King County. Timely federal
6 reimbursement necessarily depends on the availability of federal employees to accept reimbursement
7 requests, process those requests, approve them, and issue payments. Lapses in federal payment
8 timelines increase costs for King County’s operations and can have a substantial deleterious impact
9 on third parties that work with King County, including nonprofit organizations who already struggle
10 financially to stretch each dollar in serving the public.

General Direct and Indirect Hanns

Arising from the Dismantling of the federal Government

13 10. I am informed, and on that basis, believe, that over 120,000 federal employees have
14 been fired or laid off by the federal government in 2025 to date.

15 11. The widely-reported summary termination of a vast number of federal employees from
16 various agencies over the past couple of months, as directed by the United States Office of
17 Management and Budget (“OMB”), Office of Personnel Management (“OPM”), and Department of
18 Government Efficiency (“DOGE”), has had and continues to have immediate, negative, and
19 increasingly drastic impacts to King County’s operations, planning, and delivery of services to the 2.3
20 million people of King County. Continued reductions in the federal workforce, including what appear
21 to be draconian cuts to EPA, HUD, NOAA, and AmeriCorps offices, have exacerbated these negative
22 impacts. King County staff have been unable to reach federal employees who are responsible for
23 managing awarded grants that provide critical funding for current projects and operations. Meetings
24 and national briefing calls staffed by federal employees to disseminate information critical to service
25 delivery, crisis response, and continuous improvement have been canceled. Emails and calls have
26 gone unanswered. Federal employee team members are disappearing from work teams, requiring
27 King County to pause delivery of services to communities.

28 12. As one example, it has been reported that the U.S. Department of Health & Human

1 Services (“HHS”) is eliminating and consolidating functions, including post-disaster U.S. Centers for
2 Disease Control and Prevention (“CDC”) teams. At the same time, the federal government is cutting
3 or proposing to cut funding to states that, coupled with Washington’s current budgetary crisis, will
4 likely see the elimination of a large number of Washington State Department of Health (“WA DOH”)
5 positions. Further compounding this situation is King County’s own budgetary shortfall (separate
6 from the unlawful delays and terminations of federal grants made directly to King County and passed
7 through the State of Washington) that will potentially reduce the number of personnel with, for
8 example, the Department of Public Health for Seattle and King County (“PHSKC”). The result will
9 be that for critical issues like disaster preparedness and disease outbreaks, there will be fewer
10 professionals available to prepare, investigate, and respond.

11 13. Another major preparation and coordination challenge involving multiple federal
12 agencies is the FIFA World Cup that will take place in North America in 2026. The United States has
13 a majority of the venues and games; Lumen Field in Seattle will have six games in June and July 2026,
14 including two in the “knockout” stage. Many different federal agencies touch this event, which is
15 slated to be the largest sporting event internationally to date. There will be millions of visitors coming
16 to the United States; in this region, approximately 750,000 unique individuals are expected to travel
17 to the area for the event(s). Reductions in Force (“RIF”) in the federal workforce, downsizing, and
18 eliminations of entire programs and offices may result in a lower level of readiness for the federal
19 government, which has a responsibility to coordinate and ensure the security of events such as the
20 FIFA World Cup across the entire country through agencies including DHS, the U.S. Department of
21 State (“State”), and the U.S. Department of Justice (“DOJ”).

Harms Arising from the Downsizing of Federal Agencies

23 14. The following are select examples of impacts that the federal government's RIFs have
24 had, will have, or may have, on King County operations, including what appear to be likely future
25 impacts from additional threatened terminations of federal employees:

Harms Related to Downsizing of U.S. Department of Agriculture

27 15. King County owns and operates King County International Airport-Boeing Field
28 (KCIA), located four miles south of downtown Seattle. KCIA is one of the busiest non-hub airports

1 in the nation, serving small commercial passenger airlines, cargo carriers, private pilots, corporate jets,
2 helicopters, and military aircraft.

3 16. A large-scale RIF at the U.S. Department of Agriculture (“USDA”) may cause King
4 County to experience, among other things, increased hazards to air traffic at KC1A. The USDA
5 provides a wildlife biologist to manage prey animals that attract predatory birds, the presence of which
6 create a hazard to air traffic. Should the USDA suffer sudden and unexpected staffing reductions,
7 KC1A could be temporarily left without a biologist to manage wildlife conditions that could increase
8 the risk of bird strikes to aircraft. Alternatively, KCIA would incur increased costs not currently
9 accounted for in King County’s budget by way of having to manage wildlife conditions without USDA
10 support.

11 17. King County is also aware of USDA's plan to reorganize and cut nearly \$2 billion for
12 food programs. Specifically, King County is aware that the USDA has already cut \$500 million from
13 the Local Food Purchase Assistance program ("LFPA"), is in the process of cutting \$500 million from
14 The Emergency Food Assistance Program ("TEFAP"), and is in the process of cutting an amount in
15 excess of \$700 million from the Local Food for Schools Program ("LFS"). These nationwide cuts
16 will have a pronounced effect in King County, where local food banks and meal providers are already
17 struggling to meet escalating demand. These three programs are only the most visible examples -
18 there are numerous other smaller cuts and canceled contracts that are disrupting the ability of farmers
19 and community partners to grow and distribute food effectively in our communities. Should the USDA
20 suffer a large-scale RIF in association with these significant costs to funding, programmatic support
21 and staff expertise will be lost, corresponding program reach will be reduced, and vulnerable residents
22 of King County will no longer be receiving the services they require. Alternatively, King County will
23 incur increased cost to make up for the loss in federal support beyond that included in the current
24 budget.

Harms Related to Downsizing of AmeriCorps

26 18. PHSKC runs a Public Health Reserve Corps (“PHRC”) program that works with a
27 Preparedness AmeriCorps member to expand capacity to deliver services to vulnerable residents of
28 King County. This week’s loss of this AmeriCorps team member means that King County likely will

1 need to cancel several scheduled volunteer events including care clinics with homeless service
2 providers and naloxone distribution and trainings.

3 19. The King County Executive Climate Office (“ECO”) currently has a fellow under the
4 CivicSpark AmeriCorps program who is helping to support the King County – Cities Climate
5 Collaboration and the development of King County’s Strategic Climate Action Plan. A previous
6 fellow also helped with King County - Cities Climate Collaboration as well as our Wildfire Mitigation
7 Strategy implementation and partner convening. Other King County agencies, including the Office of
8 Emergency Management (“OEM”), also have AmeriCorps members through the Washington Service
9 Corps.

10 20. Loss of AmeriCorps partnerships through the PHRC, CivicSpark, and other programs
11 would lead to increased cost to King County by needing to fund new positions that were previously
12 subsidized through AmeriCorps, and may lead to a loss of building local workforce capacity and
13 cultivating career opportunities for future civic leaders in the region.

Harms Related to Downsizing of U.S. Department of Commerce

15 21. King County employees depend on working relationships with U.S. Department of
16 Commerce (“Commerce”) employees in the National Marine Fisheries Service (“Fisheries”) and
17 National Weather Service (“NWS”) within Commerce’s National Oceanic and Atmospheric
18 Administration (“NOAA”) for permitting capital projects, preparing and responding to hazardous
19 weather, and managing and protecting local marine wildlife.

20 22. A large-scale R.IF at Commerce would cause King County to experience, among other
21 things:

22 a. Delays and associated increased costs in commencing time-sensitive capital projects
23 due to delays in consultations and permit review and issuance relating to, among other
24 things, Fisheries' Endangered Species Act ("ESA") and Essential Fish Habitat ("EFH")
25 review.

26 b. Loss of critical staffing for interagency emergency response teams historically
27 comprised of King County and NWS team members who coordinate to conduct
28 outreach to communities and provide education before major weather events like the

1 November 2024 “bomb cyclone” windstorm that resulted in several fatalities.

2 c. Loss of critical factual data that is otherwise provided to King County’s Emergency
 3 Management staff by NWS on weekly regional coordination calls that provide essential
 4 briefings on King County-specific weather information, including hazardous weather,
 5 and protects responder lives and safety in addition to the lives and safety of King
 6 County residents and visitors.

7 d. Loss of critical partnership with Fisheries in developing and implementing Puget
 8 Sound Salmon Recovery Plans that are essential to management and protection of
 9 several species of salmon within King County and the region’s overall biodiversity.

10 e. Loss of NOAA staff expertise and collaboration on scientific studies, impacting King
 11 County’s ability to implement and monitor environmental initiatives effectively. Of
 12 note, numerous King County departments have reported that NOAA has effectively
 13 gone “dark” by way of a recent complete cessation in communications.

14 23. In light of the above concerns, implementation of Commerce’s RIF may cause King
 15 County to (1) incur significant delays in its ability to timely complete projects held up by lack of
 16 staffing to review and process consultations and permits, (2) be unable to appropriately prepare for
 17 and respond to hazardous weather, and/or (3) incur additional costs relating to weather preparedness
 18 and emergency response to hazardous weather.

19 **Harins Related to Downsizing of U.S. Department of Defense**

20 24. A large-scale RIF at the U.S. Department of Defense (“DoD”) would result in King
 21 County experiencing, among other things, delays in the review and issuance of permits that, in turn,
 22 could result in increased capital project (construction) costs as well as an inability of King County to
 23 support its residents with critical infrastructure and environmental improvements.

24 25. King County often engages with DoD’s U.S. Army Corp of Engineers (“USACE”) to
 25 secure permits required for work performed on any navigable body of water designated as water of
 26 the United States. USACE permits are also required for work in any wetlands, whether contiguous or
 27 not, to such bodies of water.

1 26. As one example, King County’s Department of Natural Resources and Parks’
 2 (“DNRP”) Wastewater Treatment Division (“WTD”) has a number of current permits as well as permit
 3 applications lodged with USACE for in-water construction work as part of critical infrastructure
 4 improvements to King County’s aging wastewater treatment conveyance systems. Robust
 5 communication with USACE employees is critical for the projects to begin and continue. If permit
 6 approvals are not provided on time, select construction work may need to be moved to 2026 due to
 7 “fish windows” (approved work windows for fish protection in the area). Moving construction work
 8 one year, in turn, will result in significantly increased costs of construction due to inflation, and will
 9 also delay these critical improvements to the wastewater system in detriment to the residents of King
 10 County.

11 27. WTD also relies on weekly, if not daily, support from a USACE inspector – alongside
 12 an EPA inspector – for in-water work to continue the critical Lower Duwamish Waterway (“LDW”)
 13 Superfund Cleanup work that is currently underway. If USACE staffing is cut that includes this
 14 inspector, progress on the LDW Superfund Cleanup may stall, or the work, if it proceeds, may risk
 15 proceeding in a noncompliant matter.

16 28. King County further engages with USACE in relation to Section 106 of the National
 17 Historic Preservation Act of 1966 (NHPA), which requires federal agencies to consider the effects of
 18 projects on historic properties. A large-scale RIF may result in delays in this requisite review, which
 19 would also delay construction projects throughout King County and bring the potential for increased
 20 costs due to inflation.

21 **Harms Related to Downsizing of U.S. Department of Energy**

22 29. A large-scale RIF at the U.S. Department of Energy (“DOE”) would result in King
 23 County experiencing, among other things, delays in the implementation of critical work funded by
 24 DOE grants.

25 30. As one example, the King County Executive Climate Office (“ECO”) is currently
 26 implementing an Energy Efficiency and Conservation Block Grant (“EECBG”) under DOE’s EECBG
 27 Program. This grant is important to King County as it will allow it to continue its efforts to reduce
 28 fossil fuel emissions and energy use, and improve energy efficiency in various sectors. On April 24,

1 2025, ECO was advised that the technical project officer for that particular grant was leaving DOE,
 2 that ECO may reach out to various email addresses unattached to specific people such as
 3 eeccb@hq.doe.gov for issues and questions, and that a new technical project officer has not yet been
 4 assigned to the grant.

5 **Harms Related to Downsizing of Environmental Protection Agency**

6 31. A large-scale RIF at the U.S. Environmental Protection Agency (“EPA”) would result
 7 in King County experiencing, among other things:

8 a. Delays and uncertainty, including risk of reduced federal oversight and support in
 9 implementing and maintaining existing grants, including the \$50 million Climate
 10 Pollution Reduction Grant (“CPRG”) awarded to the King County Executive Climate
 11 Office (“ECO”), affecting programs like embodied carbon initiatives and reliance on
 12 Energy Star tools for building decarbonization. Delays to the implementation of this
 13 CPRG grant have already been felt, initially due to the “freeze” on federal funds
 14 addressed in the matter *State of New York, et al. v. Trump et al.* (25-cv-00039-JJM-
 15 PAS), then due to an internal EPA “communications hold” that ECO learned about
 16 from EPA employees who are, as of the past two months, no longer employed by EPA.

17 i. As part of King County’s obligated EPA CPRG award, there is a component
 18 of the grant focused on embodied carbon. King County is informed and
 19 believes that EPA has canceled other grants that were to be focused on
 20 embodied carbon and reassigned much of their embodied carbon staff. Without
 21 an embodied carbon team at EPA, and without the data quality, disclosure, and
 22 thresholds guidance that EPA and EPA grantees were developing, King County
 23 is concerned there may be a negative impact on its ability to fully implement
 24 the embodied carbon portion of the CPRG award. Additionally, there may be
 25 embodied carbon tools or data sets King County is now unable to access (from
 26 EPA, GSA, and other federal agencies).

27 ii. Also as part of the CPRG award, King County’s building decarbonization
 28 programs rely on EPA’s Energy Star programs, especially Energy Star Portfolio

1 Manager, which is a free tool used to collect building-level energy use data.
2 Energy Star also has programs that set standards for appliances as well as
3 building energy use rating systems. If these programs end or are understaffed
4 such that they do not function well, there will be negative impacts on King
5 County's ability to meet its building decarbonization targets, as well as measure
6 progress toward them. Relatedly, as King County ramps up its flourishing heat
7 pump and solar programs, it is concerned that cuts in staff may have impacts
8 related to ensuring supply chains for these products.

9 b. Beyond the above-referenced CPRG award, many King County agencies and
10 departments including ECO, WTD, OEM, PHSKC, and others, have existing grants
11 with EPA. For these existing grants, EPA project officers are required to review and
12 approve recipient reports and submittals in order to maintain existing awards in good
13 standing. EPA project officers are also required to review and approve expenditures
14 and programmatic changes requiring prior federal approval, as well as any requested
15 amendments, supplements, or no-cost extensions of existing awards. The review and
16 approval process provides important independent affirmation of King County
17 compliance with federal standards applicable nationwide.

18 i. For example, King County's WTD funds critical projects through EPA's Water
19 infrastructure Finance and Innovation Act ("WIFIA") loan program, which
20 aims to accelerate investment in the nation's water infrastructure by providing
21 long-term, low-cost financing to enable upgrades to water and wastewater
22 infrastructure of regional or national importance. Robust communication with
23 EPA employees is a critical component of advancing these WIFIA-funded
24 projects.

25 c. Potential loss of EPA staff inspectors, as well as staff expertise and resources crucial
26 for data quality and program support, will impact King County's ability to implement
27 and monitor environmental initiatives effectively.

28 i. As described above, WTD relies on weekly, if not daily, support from an EPA

inspector – alongside an USACE inspector – for in-water work to continue on the critical LDW Superfund Cleanup work that is currently underway. If EPA staffing is cut that includes this inspector, progress on the LDW Superfund Cleanup may stall, or the work, if it proceeds, may risk proceeding in a noncompliant matter.

- d. Diminished collaboration and data sharing with EPA staff critical for climate and environmental assessments could hinder accurate greenhouse gas (“GHG”) inventories and both mitigation and adaptation planning. Many climate issues like clean air or clean water do not know government jurisdictional boundaries, and in some cases, federal entities such as EPA are needed to convene two or more parties to develop solutions for some of the regional challenges that arise. Additionally, GHG inventories and estimates of mitigation measures are very dependent and reliant on federal data sources to provide county or state level data that is used as the basis for inventory and mitigation measure analysis. Accuracy and confidence in estimates depend upon regularly updated data using standardized and consistent data collection and reporting methods.
- e. The removal and associated loss to the public of mapping tools providing data on regions where there are concentrations of pollution burden and socially vulnerable populations creates challenges to our ability to determine where the deployment of mitigation strategies is most effective and impactful. These tools include the EPA EJ SCREEN (no longer available), the Climate & Economic Justice mapping tool (no longer available), and the DOE Energy Justice mapping tool (no longer available).
- f. Compromised hazardous materials response and cleanup efforts due to reduced EPA staffing and contractor support may affect health and environmental outcomes in the region.

32. These potential impacts would pose significant challenges to King County's environmental management and climate mitigation strategies, potentially hindering progress and effectiveness in addressing local and regional environmental issues, the direct and indirect impacts of

1 which will be felt by residents in the near and long term.

2 **Harms Related to Downsizing of U.S. Department of Health & Human Services**

3 33. A large-scale RIF at the U.S. Department of Health & Human Services (“HHS”) would
4 result in King County experiencing, among other things:

5 a. Disruptions in grant management communications with U.S. Centers for Disease
6 Control and Prevention (“CDC”) staff, resulting in delays to critical public health
7 programs like the REACH (Racial and Ethnic Approaches to Community Health)
8 grant, and forcing King County to divert other limited funds as an unsustainable
9 stopgap.

10 i. PHSKC staff have not been able to reach the grant management specialist
11 responsible for approving contract amendments for the REACH grant despite
12 emailing, calling, leaving voicemails, calling the specialist’s supervisor, and
13 sending messages through the Grant Solutions platform. REACH is a CDC-
14 funded program that uses proven strategies to help improve health, prevent
15 chronic diseases, and reduce racial and ethnic health disparities and gaps. Due
16 to this lack of communication, King County’s amendment request to add a new
17 contractor has remained unanswered since March 2025. To mitigate as a short-
18 term solution, King County is having to leverage different funding to secure the
19 contract. This stop-gap measure is not sustainable as it will compromise King
20 County’s ability to deliver other important public health services.

21 ii. PHSKC’s Community Health Worker Unit experienced a similar cessation in
22 communication with their CDC Project Officer, receiving only an email
23 response stating, “Your message couldn’t be delivered to the recipient because
24 you don’t have permission to send to it.” This resulted in confusion and concern
25 about potential interruptions in grant-related work.

26 b. Loss of essential personnel, including the firing of a Public Health Associate Program
27 (“PHAP”) participant who worked in King County’s Sexual Health Clinic and saw Pre-
28 Exposure Prophylaxis (“PrEP”) patients. King County’s Sexual Health Clinic provides

1 PrEP for HIV to the greatest number of people of any clinic in the state – more than
 2 1,000 patients. PrEP is a highly effective strategy to prevent HIV among people at high
 3 risk of contracting the disease. Cutting this position reduces capacity to deliver an
 4 effective prevention strategy, and this could in turn increase the risk of HIV
 5 transmission.

6 c. Cancellation of regular national public health coordination calls, impeding the
 7 dissemination of vital information across federal, state, and local public health officials
 8 and program staff needed for disease detection, response, and ongoing public health
 9 program management.

10 d. Significant risks to the administration of Medicaid services, including \$310 million in
 11 state and federal funding for 50,000 individuals, which could threaten King County's
 12 ability to deliver critical healthcare services to vulnerable populations and impose
 13 severe financial burdens.

14 34. As shown through the examples above, a large-scale RIF at HHS could seriously
 15 compromise King County's public health infrastructure, healthcare delivery, and the health and
 16 wellbeing of its most vulnerable residents.

17 **Harms Related to Downsizing of (J.S. Department of Homeland Security**

18 35. A large-scale RIF at the U.S. Department of Homeland Security ("DHS") could
 19 severely impair King County's airport (as defined herein, "KCIA") operations, emergency
 20 management, environmental restoration projects, and community resilience, while increasing financial
 21 burdens and risk across multiple critical services. Loss of federal employee partners would result in
 22 King County experiencing, among other things:

23 a. Delays in U.S. Customs and Border Protection ("CBP") agency services at KCIA,
 24 causing international flights to sit idle on the ramp until officers arrive to process
 25 arrivals, disrupting passenger flow and airport operations. Specifically, KCIA is a
 26 gateway for international arrivals necessitating a presence by CBP officers. Federal
 27 law requires all international arrival flights to park on the main terminal ramp and await
 28 a CBP officer to board the aircraft and approve the entry of passengers prior to entry

1 into the United States. When CBP suffers staff shortages, aircraft must sit on the ramp
2 and await officers to arrive from approximately 10 miles away to perform the
3 inspection before the passengers can disembark.

4 b. Potential reductions in Transportation Security Administration (“TSA”) staffing,
5 jeopardizing KCIA’s ability to conduct required passenger screenings under the DCA
6 Standard Security Program for flights into Ronald Reagan Washington National
7 Airport. Specifically, KCIA administers Transportation Security Administration
8 passenger screening procedures under the DCA Standard Security Program
9 (“DCASSP”). The airport is one of only two airports located in the State of Washington
10 authorized to screen passengers for flights into Ronald Reagan Washington National
11 Airport (“DCA”) near Washington DC. Reductions in TSA staff would potentially
12 impact the airport’s ability to provide screening services under the DCASSP.

13 c. Diminished Federal Emergency Management Agency (“FEMA”) capacity, reducing
14 King County’s ability to conduct community emergency preparedness outreach,
15 respond efficiently to infrastructure damage from disasters, and receive timely
16 reimbursements for disaster recovery work, including road repairs and flood facility
17 restoration.

18 d. Loss of FEMA-funded staff at King County’s Office of Emergency Management
19 (“OEM”), threatening the implementation of critical public safety strategies, including
20 wildfire risk reduction and extreme heat mitigation plans. For example, FEMA-funded
21 OEM staff are currently leading the development of a Community Wildfire Protection
22 Plan called for in Action 4 of the Wildfire Risk Reduction Strategy. Additional impacts
23 could also occur depending on which OEM staff funded by FEMA are laid off.

24 e. Significant permitting delays for local projects requiring FEMA review or approvals,
25 such as stream relocations tied to floodplain management, risking costly project
26 postponements and increased construction costs.

27 i. For example, within King County’s Department of Local Services (“DLS”),
28 their permitting agency often sees local applications filed either after a federal

1 agency has issued a permit to the applicant, or while an application for a federal
2 permit is under review. The majority of the time, these permits are issued by
3 FEMA. If there is an RIF within FEMA, the DLS applicants may see a delay
4 in review and/or issuance of permits that are a prerequisite to DLS issuing a
5 subsequent and related permit to authorize a project to proceed. Currently, and
6 as one example, there is a project for which the City of Redmond is seeking
7 approval from DLS that will require the relocation of a stream. This stream
8 relocation requires a letter of map amendment from FEMA, the application for
9 which was provided to FEMA some time ago, with no response to date and
10 reflecting a serious delay. If the letter of map amendment is not provided this
11 spring, the project will be delayed until spring 2026, and the City of Redmond
12 has advised their project (construction) costs may increase by approximately \$1
13 million due to inflation and other considerations. The City of Redmond has
14 asked DLS to exempt the requirement of receiving this map amendment and
15 deal with FEMA later, but that is a risk DLS is unable to take. If DLS were to
16 approve the project without the map amendment, and FEMA subsequently
17 declined to issue the map amendment, the time and costs involved in reversing
18 the project's construction would be significant.

19 f. Potential negative impacts on King County's flood program and insurance ratings if
20 FEMA staffing reductions lead to noncompliance findings during audits, creating
21 cascading financial and operational risks over time.

22 g. Delays in Section 106 reviews under the NHPA for federally connected projects,
23 potentially stalling key capital projects aimed at habitat restoration and flood hazard
24 reduction.

25 36. As shown through the examples above, a large-scale RIF at DHS could result in, among
26 other things, noticeable delays at KCIA for airplane passengers, delays and increased costs for local
27 construction projects, and delays and/or the inability to conduct effective and comprehensive
28 community emergency preparedness outreach, respond efficiently to infrastructure damage from

1 disasters, and receive timely reimbursements for disaster recovery work, including road repairs and
 2 flood facility restoration.

3 **Harms Related to Downsizing of U.S. Department of Housing and Urban Development**

4 37. King County is advised of the announced closure of the U.S. Department of Housing
 5 and Urban Development's ("HUD") Region 10 office in Seattle - serving Alaska, Idaho, Oregon, and
 6 Washington. King County is advised that this closure will impact approximately 150 employees. The
 7 closest HUD office would be in San Francisco, which is more than 650 miles from Portland and 850
 8 miles from Seattle.

9 38. A large-scale RIF at the HUD could deeply undermine King County's housing stability,
 10 affordable housing development, veteran services, disaster recovery capacity, and the health and safety
 11 of vulnerable communities. It would result in King County experiencing, among other things:

- 12 a. Delays in the execution of federal contracts for approximately \$47 million in
 13 Continuum of Care ("CoC"), Community Development Block Grant ("CDBG"),
 14 HOME Investment Partnerships ("HOME"), and Emergency Solutions Grant ("ESG")
 15 funds, forcing King County to temporarily cover costs and risking contract
 16 cancellations with service providers if delays persist.
- 17 b. Risk of widespread eviction of upwards of 2,144 households due to discontinuation of
 18 \$20 million in CoC rent payments and the shutdown of supportive services for
 19 permanent supportive housing, leading to unsafe living environments and staff layoffs.
- 20 c. Inability to support operations and services for permanent supportive housing buildings
 21 resulting in provider staff layoffs and unsafe environments for residents and staff
 22 (\$17M in CoC funds).
- 23 d. Pausing of critical community capital projects, including health and safety
 24 improvements at community centers, senior center elevator replacements, affordable
 25 housing developments, and housing repair programs.
- 26 e. Project delays and significant additional costs for affordable housing development if
 27 HUD staff reductions impede issuance of required National Environmental Policy Act
 28 ("NEPA") clearances, including the Authority to Use Grant Funds ("AUGF"). Without

1 the AUGF, King County cannot release funds awarded to affordable housing
2 development. Decreased HUD staff capacity could cost housing developers hundreds
3 of thousands of dollars in project delays.

4 f. Severe impacts to King County’s Collaborative Case Management (“CCM”) program
5 for veterans, reducing coordination with HUD-VASH programs and limiting King
6 County’s ability to connect veterans to vital housing and supportive services.

7 i. In 2021, King County launched CCM, a first-of-its-kind program blending
8 Housing and Urban Development – Veterans Affairs Supportive Housing
9 (“HUD-VASH”) rental assistance vouchers with local housing navigation and
10 supportive services offered by the King County Veterans Program (“KCVP”).
11 Earning a National Association of Counties (“NACo”) 2023 Achievement
12 Award recognizing innovative county government programs, CCM depends on
13 close collaboration with federal employees implementing the HUD-VASH
14 program. On January 29, 2025, King County staff learned that the U.S.
15 Department of Veterans Affairs (“VA”) had received a directive from the
16 federal administration prohibiting communication and coordination with any
17 non-federal organization. Subsequent updates indicated CA referrals to CCM
18 had resumed, but case conferencing and coordination of initial triage of veterans
19 trying to enter the program remains limited. King County’s ability to serve
20 veterans has diminished significantly with the RIF.

21 g. Slowed disaster recovery and community rebuilding efforts if HUD’s Community
22 Development Block Grant Disaster Recovery (“CDBG-DR”) programs are strained,
23 potentially shifting the financial and operational burden onto King County, which lacks
24 sufficient resources to fill these gaps.

25 h. The loss of federal employees at HUD may negatively impact King County’s ability to
26 draw down above-referenced committed federal funds, access portals, and
27 communicate with staff. Specifically, King County understands HUD is down to only
28 one environmental officer for the region which could slow environmental reviews.

1 King County is also advised that DOGE is considering cutting off the online
 2 environmental review system and reverting to paper reviews, which would be a large
 3 burden on staff.

4 i. Cuts to HUD staffing will likely strain programs like Community Development Block
 5 Grants for disaster recovery, potentially slowing down housing and community
 6 rebuilding efforts. These reductions could shift the burden to state and local
 7 governments. King County currently lacks the resources that would be needed to fill
 8 the potential gap.

9 **Harms Related to Downsizing of U.S. Department of the Interior**

10 39. A large-scale RIF at the U.S. Department of the Interior (“DOI”) would significantly
 II slow King County’s ability to complete infrastructure, transportation, and environmental projects,
 12 increase costs, and reduce the effectiveness of efforts to protect endangered species and historic
 13 resources. It would result in King County experiencing, among other things:

14 a. Increased uncertainty and project delays due to extended consultation and permit
 15 review and issuance in ESA and EFH reviews conducted by U.S. Fish and Wildlife
 16 Service (“USFWS”) along with NOAA Fisheries, which oversee species like Chinook
 17 Salmon and Bull Trout, affecting King County’s ability to move forward with critical
 18 infrastructure and environmental projects.

19 b. Risks to the productivity of two recently hired King County staff who report to DOI,
 20 and who are dedicated to expediting ESA reviews, as the federal supervisors they report
 21 to could be subject to layoffs, thereby undermining King County’s investment in these
 22 positions.

23 c. Delays in compliance with Section 106 of NHPA, which requires consultation with the
 24 Bureau of Indian Affairs and other DOI agencies on the impacts of federally funded or
 25 permitted projects on historic properties, potentially stalling project approvals.

26 **Harms Related to Downsizing of U.S. Department of Transportation**

27 40. A large-scale RIF at the U.S. Department of Transportation (“DOT”) would slow
 28 critical aviation and transportation projects, increase safety risks for air travelers and road users, and

1 delay important infrastructure work needed to support King County's growing transportation
2 demands, it would result in King County experiencing, among other things, the following:

- 3 a. Significant delays in communication and critical approvals from the Federal Aviation
4 Administration's ("FAA") Airport District Office ("ADO"), affecting KC1A airport
5 planning, grant administration, environmental reviews, safety certifications, and
6 airspace hazard analyses, which could threaten airport safety and financial
7 sustainability. Specifically, KC1A depends on communication with key individuals at
8 ADO for planning and program management. KCIA administers various projects
9 funded by the Airport Improvement Program ("AIP") which include federal grant
10 administration and reimbursement for planning and project costs, preparation and
11 ongoing approval of the Airport Layout Plan, preparation of environmental
12 documentation under NEPA, airport certification and safety approvals pursuant to
13 14 C.F.R. Part 139, and airspace hazard analysis pursuant to 14 C.F.R. Part 77 for on-
14 airport and airport-adjacent construction projects, among other activities mandated by
15 the FAA.
- 16 b. The recent layoff of FAA probationary employees, which has subsequently been
17 reversed, caused a noticeable delay in obtaining timely responses from the ADO.
18 Further staff reductions at the FAA would cause delays in critical approvals and
19 guidance that could adversely impact airport safety and financial sustainability.
- 20 c. Increased safety risks if FAA air traffic controller staffing shortages occur.
21 Specifically, KCIA maintains an air traffic control ("ATC") tower staffed by FAA air
22 traffic controllers on a 24 hour per day, seven day per week basis. Should staffing
23 shortages occur among the air traffic controllers, leaving the airport tower without staff,
24 the airport would revert to a condition known as "ATC Zero" where pilots would need
25 to operate in and out of KCIA on their own without ATC guidance, increasing the risk
26 of accidents due to airspace congestion, ground hazards and adverse weather
27 conditions. KCIA currently experiences over 180,000 flight operations per year
28 including corporate jet traffic, large cargo jet aircraft operated by the United Parcel

1 Service and delivery and test flights of aircraft ranging from the 737MAX to the 777X
 2 manufactured and operated by The Boeing Company.

3 d. Disruptions to King County's traffic safety initiatives, as the DOT'S leadership in
 4 Target Zero strategies and Safe Streets for All ("SS4A") grant support may be reduced,
 5 potentially stalling progress toward reducing traffic fatalities and improving safety for
 6 all road users.

7 c. Delays in compliance with Section 106 of NHPA for transportation projects requiring
 8 federal review through the Federal Highway Administration ("FHWA"), potentially
 9 slowing project approvals.

10 f. Impacts to King County's Road Services Division transportation projects, which
 11 depend on coordination between the Washington State Department of Transportation
 12 ("WSDOT") and federal agencies like FHWA to maintain compliance with federal
 13 regulations. Staffing reductions could cause further permitting and project execution
 14 delays.

15 **Harms Related to Downsizing of U.S. Department of Veterans Affairs**

16 41. King County legislation authorizing the Veterans, Seniors, and Human Services Levy
 17 ("VSHSL"), and its corresponding implementation plan, identifies veterans, military service members,
 18 and their families as a priority population for the levy and, by extension, for PHSKC's Adult Services
 19 Division. In PHSKCs efforts to serve this population, it relies heavily on the availability of services
 20 provided by federal partners, particularly the U.S. Department of Veterans Affairs ("VA").

21 42. In relation to PHSKC's services through its Adult Services Division, King County is
 22 aware of the following impacts already felt to date by King County residents following RIF as well as
 23 cuts to funding arising from or related to the VA:

24 a. Many VA contracts have been cut, particularly in communications, outreach, and
 25 research areas.

26 b. With the increased return-to-office mandates, doctors are facing significant privacy
 27 issues leading to consultations occurring in shared conference rooms, sometimes with
 28 multiple people present.

- 1 c. There have been reductions in mental health provider availability.
- 2 d. The VA has reduced or removed gender-affirming care and eliminated certain veteran-
- 3 specific programs.
- 4 e. A local community member shared their experience of calling to make an appointment
- 5 with their primary care provider, only to find they were reassigned to a new provider
- 6 who is only available in the office one day a week for less than a full day.
- 7 f. Veterans shared calling offices in neighboring counties, such as Snohomish, and
- 8 reported only one answering.
- 9 g. Reports of hospital employee terminations have raised concerns among veterans who
- 10 feel that civilian healthcare organizations may not be fully equipped to handle their
- 11 unique needs.

12 43. A large-scale RIF at the VA would also harm King County's innovative housing and
 13 support efforts for veterans, delay services for those in need, and undermine collaboration critical to
 14 program success. It would result in King County experiencing, among other things:

- 15 a. Significant disruption to the Collaborative Case Management ("CCM") program,
 16 which blends HUD-VASH rental assistance vouchers with local housing navigation
 17 and support services and relies on close collaboration with federal VA employees.
- 18 b. Ongoing limitations on case conferencing and initial triage coordination for veterans
 19 seeking to enter CCM, following a federal directive prohibiting communication
 20 between VA staff and non-federal organizations.
- 21 c. A substantial reduction in King County's ability to serve veterans experiencing
 22 homelessness or housing instability, weakening a nationally recognized, award-
- 23 winning program that had been advancing veteran support services.

Harms Related to Downsizing of U.S. Small Business Administration

24 44. A large-scale RIF at the U.S. Small Business Association ("SBA") would weaken King
 25 County's ability to support community recovery after major disasters by slowing critical financial
 26 assistance. It would result in King County experiencing, among other things:

- 28 a. Potential delays in damage assessments, establishment of Disaster Loan Outreach

1 Centers, and servicing of disaster loans, which are currently fully managed by SBA
2 employees.

3 b. Financial harm to residents and businesses that depend on timely access to disaster
4 loans, such as the \$13.2 million already offered and \$6.7 million disbursed following
5 the November 2024 windstorm event.

6
7 45. Due to the integration between federal, state, and local governments, there are
8 numerous other areas where large-scale RIFs of the federal workforce will impede King County's
9 mission critical operations. Because the actions of the Trump administration are unprecedented, the
10 full extent of adverse consequences that result from a substantially depleted federal workforce will
11 only fully become apparent over time.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct.

14 Executed on 29 Win- 2.02^ at Seattle, Washington.



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